

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION (DETROIT)

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846-swr

Hon. Steven W. Rhodes

**THE RETIREE ASSOCIATION PARTIES' RESERVATION
OF RIGHTS WITH RESPECT TO THE CONFIRMATION
OF CORRECTED FIFTH AMENDED PLAN FOR
ADJUSTMENT OF DEBTS FOR THE CITY OF DETROIT**

In accordance with paragraph 4 of the Court's Seventh Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment dated August 6, 2014 [Dkt. No. 6560], the Retired Detroit Police & Fire Fighters Association ("RDPFFA"), Donald Taylor, individually, and as President of the RDPFFA, and the Detroit Retired City Employees Association ("DRCEA") and Shirley V. Lightsey, individually, and as President of the DRCEA (collectively "Retiree Association Parties"), through their counsel, Lippitt O'Keefe Gornbein, PLLC and Silverman & Morris, P.L.L.C., file this reservation of rights with respect to the Corrected Fifth Amended Plan for Adjustment of Debts ("Plan") for the City of Detroit ("City") [Dkt. No. 6379] based primarily on (a) unanticipated plan changes and/or new or revised exhibits and (b) new settlements.

1. The City just filed its motion for authority to refinance the DWSD bonds which, among other things, appears to alter the priority of the payments to the GRS pension plan vis à vis the bond payments. The Retiree Association Parties are assessing how that change affects the GRS retirees.
2. The City also just filed a number of new and/or revised exhibits to the Plan, including the DIA Settlement, the Restoration Trust, and a list of reserved actions, which the Retiree Association Parties are in the process of reviewing.
3. The Retiree Association Parties are in mediation with the City and the Committee regarding several issues regarding the VEBAs that will provide health care benefits to the retirees after the effective date of the Plan.
4. The Retiree Association Parties reserve the right to object to these and any further amendments to or versions of the Plan, in particular any amendment inconsistent with the term sheets agreed to by the City and the Retiree Association Parties, as well as any free-standing motions that affect the Plan.

Respectfully submitted,

By: /s/Thomas R. Morris
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Dated: August 13, 2014